## LiteWire Internet Services, Inc.



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444 Twelfth Street, S.W.
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Re: Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band, ET Docket No. 13-49.

Comments in Support of Petition for Reconsideration of WISPA, Cambium, Mimosa Networks and JAB.

Dear Ms. Dortch,

LiteWire Internet Services, Inc. (LiteWire) is filing these comments in support of the Petitions for Reconsideration filed by WISPA and Cambium Networks, Ltd. in the above referenced proceeding. WISPA and Cambium's petitions urge the FCC to reinstate the Section 15.247 GHz OOBE limits for 5725-5850 GHz band. In the first R&O, the FCC voted to replace those OOBE limits with much more restrictive limits in Section 15.407. The changes, if not reversed, would be detrimental to our subscribers, our company and to industry innovation as a whole.

LiteWire is a fixed wireless internet service provider operating in southern Wisconsin. Most of our subscribers have no other low latency broadband option. We rely heavily on the 5GHz spectrum for connecting towers together and distributing internet to customers. As WISPA, Cambium, Mimosa Networks and JAB have illustrated, the restrictive OOBE limits in section 15.407 will make it impossible for us to continue to provide affordable, high performance broadband service in many of these areas, and will not improve efficient use of the 5GHz band. If the Section 15.407 replacement of the Section 15.247 OOBE rules remains in effect, increased equipment costs, distance limitations and limited frequency availability will severely limit (and likely eliminate) wireless broadband in many rural service areas such as we serve. All of this despite the fact that *legally deployed* links (under the current 15.247 rules) in the 5725-5850 MHz band have never been shown to cause any interference to TDWRs operating at least 75MHz away in the 5600-5650 MHz band.

LiteWire joins with the petitioners to encourage the FCC to reinstate Section 15.247 OOBE rules which applied to unlicensed operations in the 5725-5850 MHz band.

Respectfully Submitted,

Jamés Howard

Vice President/Chief Administrative Officer

LiteWire Internet Services, Inc.